

# Keller | Postman

October 20, 2023

## VIA ECF

The Honorable Denise L. Cote  
United States District Court Judge  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, New York 10007

Granted.  
Denise Cote  
10/30/23

Re. *In Re: Acetaminophen – ASD–ADHD Products Liability Litigation*, Case No. 1:22-md-03043 (S.D.N.Y.) – Motion to File Under Seal  
**This Document Relates To:** All Cases

Dear Judge Cote:

Consistent with the Court’s October 2, 2023 Order, Dkt. 1217, Plaintiffs submit this letter to request that a portion of Plaintiffs’ Reply in Support of Plaintiffs’ Rule 702 Motion to Exclude Dr. Mary D’Alton (“Reply”) be filed under seal pursuant to the Protective Order, Dkt. 351 (the “Protective Order”), and Rule 8-B of the Court’s Individual Practices. Plaintiffs’ Reply references Exhibit 7 to Plaintiffs’ Rule 702 Motion to Exclude Dr. Mary D’Alton, which the Court granted Plaintiffs’ leave to file under seal. *See* Dkt. 1217, Order; Dkt. 1163 (requesting to file Exhibit 7 under seal). As noted in Plaintiffs’ September 19, 2023 letter motion to file under seal, JJCI designated Exhibit 7 as “Highly Confidential – Subject to Protective Order.” Dkt. 1163 at 1 (explaining that Exhibit 7 contains “trade secret[s] or other confidential research, development, or commercial information” subject to the protection of Federal Rule of Civil Procedure 26(c)(1)(G) because these exhibits contain JJCI’s proprietary business communications and information.”). Plaintiffs thus respectfully ask that the portion of Plaintiffs’ Reply that discusses Exhibit 7 be redacted and filed under seal.

Pursuant to the Protective Order and Rule 8-B of the Court’s Individual Practices, Plaintiffs will contemporaneously file the proposed sealed documents under seal in the ECF system and electronically relate that document to this letter-motion.

Respectfully submitted,

/s/ Ashley Keller  
Ashley C. Keller (*Pro Hac Vice*)  
KELLER POSTMAN LLC  
150 N. Riverside Plaza LLC, Ste. 4100  
Chicago, Illinois 60606  
(312) 741-5220  
ack@kellerpostman.com